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Libertyville, IL 60048

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Ronald Arbaugh
Division of Federal-State Regulators (HFC-150)
U.S. Food and Drug Administration
5600 Fishers Lane, Room 12-07
Rockville, Maryland 20857

Dear Mr. Arbaugh,

The cattle steroid recombinant Bovine Growth Hormone, rBGH, has harmful side effects on the cows injected with it and possibly harms people who consume the cows' milk. The drug is unnecessary in an over saturated dairy industry and may pose greater health concerns than are realized at the present time. For the welfare of the American public, please consider reviewing rBGH and banning its use, at least until all the health effects are known.

The companies that support rBGH, also called recombinant Bovine Somatotropin, make a strong economic case for their drug. They argue milk can be produced more efficiently with rBGH. Some farmers contend they are able to net an additional \$0.70 per day per cow using rBGH, after adjusting for the cost of the drug and the extra feed the cows require (Peterson 1). Farmers said that their cows have produced an average of between three and six pounds more milk a day, an increase of ten to fifteen percent (Peterson 1).

rBGH supporters go on to claim that milk produced by treated cows is identical to regular milk and therefore completely safe for human consumption. The milk produced using rBGH is said to be the same because "the hormone does not accumulate in cows' bodies" (Gillette 2). They argue that the increased levels of insulin-like growth factor 1 in cows, the result of rBGH, is not passed on to humans. They note it has not been proven that higher levels of IGF-1 in humans' food raises levels in the human body (Gillette 1-2).

Despite some farmers economic success using rBGH, other farmers have been very unsuccessful and have suffered substantial losses. While rBGH supporters tout increased profits, they may not have accounted for other expenses caused by rBGH. When calculating costs with rBGH, several other factors must be included. The additional rBGH-induced milk production puts the cows under strain because it is more milk than cows typically produce. This makes the cows more likely to contract diseases such as mastitis and have more body sores, foot and leg ailments, lacerations, and digestive problems (Gaard 2-3). The cows also have a shorter life span and a lower fertility rate (Gaard 2-3). One farmer, Jay Levingston, lost \$100,000 after he had to replace 50 cows that either died or he was forced to slaughter after using rBGH (FDA Denies 1). Another farmer using rBGH, Al Cole, saw three "Bastard calves" born dead with their hind legs over their heads in a single year, when this usually occurs only once in every 500 births (FDA Denies 1).

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Contrary to the companies' claims, there are substantial health risks to people consuming milk produced using rBGH. rBGH works by increasing levels of IGF-1 in cows. Insulin-like growth factor 1 is the same in cows as it is in humans, increasing the likelihood of possible transmission (Gaard 3). In people, IGF-1 causes acromegaly and has been linked to colon tumors (Gillette 1-2). Also, the May 9th issue of *Lancet*, a British medical journal, stated there is "substantial indirect evidence of relation between IGF-1 and the risk of breast cancer" (Gillette 1-2). IGF-1 levels in untreated milk are between 1 and 9 nanograms per milliliter whereas milk treated with rBGH increases to 1 to 13 nanograms per milliliter (Gillette 1-2).

In summation, the economic benefits of rBGH are in dispute while there is significant data suggesting substantial health risks. Therefore, rBGH should be reviewed further to insure the safety of the American public. When rBGH is used, the animals get sick with greater frequency and there are hidden costs, such as animals dying sooner and a lower fertility rate. Furthermore, the milk is not needed in the U.S. As it is, the United States government buys over a billion dollars of milk products a year to keep prices competitive (Gaard 4-5). More milk will only cost the government more money. Most importantly, milk produced using rBGH is a potential health risk to people. It may possibly cause colon tumors and cancer. For these reasons, it is vital that rBGH be put under review. While there may be a few economic reasons to support rBGH, the health of the American public is far more important in the long run.

Sincerely,

A handwritten signature in cursive script that reads "Heather Johnston".

Heather Johnston

9th Grade, Libertyville Community High School

Works Cited

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